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In re:	:	UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY
SHAPES/ARCH HOLDINGS L.L.C., <u>et</u> <u>al.</u> ,	:	CHAPTER 11
Debtors.	:	CASE NO. 08-14631 (GMB) (Jointly Administered)
	:	

**APPLICATION FOR ORDER SHORTENING TIME PERIOD FOR HEARING TO
CONSIDER THE DEBTORS' DISCLOSURE STATEMENT**

TO: THE HONORABLE GLORIA M. BURNS

Your applicant, Jerrold N. Poslusny, Jr., respectfully represents:

1. Your applicant is a member with the firm of Cozen O'Connor, attorneys for the above captioned debtors and debtors-in-possession (the "Debtors").¹ I am familiar with the facts of this case.

2. Your applicant has filed a Joint Disclosure Statement for the Debtors' Second Amended Joint Plan of Reorganization (the "Disclosure Statement").

3. A shortened hearing date is requested as the Debtors, the Committee and Arch Acquisition I, LLC ("Arch") have agreed upon, and the Court has scheduled, the confirmation

¹ Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in the Motion.

hearing for July 8, 2008. The two most significant changes to the Plan and Disclosure Statement are a replacement of Arch as the plan funder and an increase in the distribution to unsecured creditors under the plan. These changes and the other changes made to the Plan, with the input of the Committee, result in an overall improvement in the Plan for the Debtors' creditors.

4. Your Applicant requests a hearing be scheduled on May 23, 2008, at 10:00 a.m. and that objections to the Disclosure Statement be filed no later than May 21, 2008, at 5:00 p.m.

5. Reduction of the time period in question is not prohibited under Fed. R. Bankr. P. 9006(c)(1) and the Rules listed therein.

WHEREFORE, your applicant requests entry of the Order submitted herewith.

Dated: May 12, 2008

COZEN O'CONNOR

By: /s/ Jerrold N. Poslusny, Jr.
Mark E. Felger
Jerrold N. Poslusny, Jr.

Attorneys for the Debtors